

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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SKYLINE STEEL, LLC,	:	
	:	
Plaintiff,	:	Civil Action No. 13 Civ. 8171 (JMF)
v.	:	
	:	JURY TRIAL REQUESTED
	:	
PILEPRO, LLC,	:	
	:	
Defendant.	:	
	:	
	:	
	x	

**DECLARATION OF JENNA LOGOLUSO IN SUPPORT OF
SKYLINE STEEL, LLC’S MOTION FOR SPOILIATION SANCTIONS**

Jenna Logoluso, under penalty of perjury, hereby declares as follows:

1. I am an Associate with the law firm of Winston & Strawn LLP, counsel for Plaintiff Skyline Steel, LLC (“Skyline”) in the above-titled action, and am admitted *pro hac vice* before this Court.

2. I am familiar with the facts of this case and make this declaration in support of Skyline Steel LLC’s (“Skyline”) Motion for Spoliation Sanctions.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the transcript of the deposition of Roberto Redondo Wendt on July 9-10, 2014.

4. Attached hereto as Exhibit 2 is a true and correct copy of Defendant PilePro LLC’s Response to Skyline Steel, LLC’s Statement of Undisputed Material Facts and PilePro’s Statement of Material Facts, dated November 24, 2014.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the deposition of Karin Maake on October 14, 2014.

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the deposition of Colin Strasser on July 16, 2014.

7. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff's Deposition Exhibit 100 containing, *inter alia*, an October 23, 2013 e-mail from Gerry McShane to Rob Wendt and Achim Wuensch.

8. Attached hereto as Exhibit 6 is a true and correct copy of the November 20, 2013 letter from Aldo Badini to Douglass Mitchell regarding the www.isheetpile.com website.

9. Attached hereto as Exhibit 7 is a true and correct copy of the December 2, 2013 letter from Douglass Mitchell to Aldo Badini.

10. Attached hereto as Exhibit 8 is a true and correct copy of Skyline's First Amended Complaint and Demand for Jury Trial, dated December 20, 2013 (Docket No. 3).

11. Attached hereto as Exhibit 9 is a true and correct copy of Plaintiff's First Request for Production of Documents to Defendant PilePro, LLC, dated March 18, 2014.

12. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiff's Notice of Deposition Pursuant to Fed. R. Civ. P. 30(b)(6) to Defendant PilePro LLC, dated May 13, 2014.

13. Attached hereto as Exhibit 11 is a true and correct copy of Plaintiff's First Amended Notice of Deposition Pursuant to Fed. R. Civ. P. 30(b)(6) to Defendant PilePro LLC, dated June 12, 2014.

14. Attached hereto as Exhibit 12 is a true and correct copy of Plaintiff's Deposition Exhibit 50.

15. Attached hereto as Exhibit 13 is a true and correct copy of Plaintiff's Second Set of Requests for Production of Documents to Defendant PilePro, LLC, dated April 11, 2014.

16. Attached hereto as Exhibit 14 is a true and correct copy of Plaintiff's Deposition Exhibit 102 containing an April 23, 2014 e-mail from Alex Reisner to Karin Maake.

17. Attached hereto as Exhibit 15 is a true and correct copy of Defendant PilePro LLC's Responses to Plaintiff's Second Set of Requests for Production of Documents, dated May 12, 2014.

18. On or about September 13, 2014, Defendant PilePro, LLC, produced a number of files containing Google Analytics data collected by PilePro from June 11, 2013, through November 8, 2013, and between June 4, 2014, and September 11, 2014. These documents bear Bates numbers PPLLC002475 through PPLLC002605.

19. Attached as Exhibit 16 is a true and correct copy of Plaintiff's Deposition Exhibit 48 containing a June 4, 2014 e-mail from Karin Maake to Douglass Mitchell and Rob Wendt.

20. Attached hereto as Exhibit 17 is a true and correct copy of excerpts from the transcript of the deposition of David Borger on November 18, 2014.

21. Attached hereto as Exhibit 18 is a true and correct copy of Plaintiff's Deposition Exhibit 103 containing a November 8, 2013 e-mail chain between, among others, Karin Maake and Aaron Lindsey.

22. Attached hereto as Exhibit 19 is a true and correct copy of the August 27, 2014 letter from Douglass Mitchell to Jenna Logoluso regarding the Papertrail log files.

23. Attached hereto as Exhibit 20 is a true and correct copy of the September 13, 2014 letter from Douglass Mitchell to Jenna Logoluso regarding the Papertrail log files.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Los Angeles, California, on December 8, 2014.

By: /s/Jenna Logoluso
Jenna Logoluso